



San Francisco Refinery
1380 San Pablo Avenue
Rodeo, CA 94572-1299

April 13, 2004

ESDR-146-04
05-A-01-C

VIA CERTIFIED MAIL – 7003 2260 0002 7101 0272

Mr. Steve Hill
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

Subject: Title V Permit Corrections for Permit Reopening

Dear Mr. Hill

ConocoPhillips Company ("ConocoPhillips") is writing in response to the District's letter from Mr. Jack Broadbent to Mr. Gary Frieburger dated February 24, 2004, inviting comments on reopening of the Major Facility Review ("Title V") permit. ConocoPhillips is requesting that corrections be incorporated into Revision 1 of Title V permit for its San Francisco Refinery (Plant #A0016). Attachment 1 contains a detailed list of corrections being requested.

In 1987, Unocal (prior owner) submitted a letter to EPA requesting an alternative standard for 40 CFR 60 Subpart QQQ ("QQQ"). However, ConocoPhillips has been unable to locate a response back from EPA on Unocal's original request. Upon further review and discussion with EPA Region 9, ConocoPhillips believes that its API Oil/Wastewater Separator (S-324) is designed to meet the standards for oil-water separators found at 40 CFR 60.692-3. The background documents for the QQQ rulemaking indicate that EPA assumed all fixed roof separators would have vents in order to prevent explosive hazards and assumed that vapor recovery was necessary to prevent separators from leaking vapors to the atmosphere through the vents. ConocoPhillips' API system is designed with a solid, vapor-tight, fixed cover that is in full contact with liquid and does not have any vents. In response to previous correspondence (e-mail dated 12/24/03) with Mr. Julian Elliot, permit engineer, ConocoPhillips' requested revisions were made to Tables IV-C and VII-C in Draft Revision 1 for QQQ. However, changes were not made to the permit shield. Attachments 2 and 3 contain a revision to the permit shield for QQQ.


The thermal oxidizer (Source A-420) that is the abatement device for Marine Loading Berths M1 (S-425) and M2 (S-426) is subject to 40 CFR 60 Subpart J. We have included a compliance schedule for this source in Attachments 4 & 5.

ConocoPhillips requests that the name of the Site Manager be changed to J. Michael Kenney, Refinery Manager on all correspondence. This permit change was requested in a letter to you dated November 7, 2003 (ESDR 309-03).

Due to the complex nature and sheer volume of requirements under the Title V permit, we reserve the right to request further corrections.

If you have any questions or need further clarifications, please contact Ms. Valerie Uyeda at (510) 245-5249.

Sincerely,



Philip C. Stern
Environmental Superintendent

PCS/vju
Attachment

cc: Julian Elliot, BAAQMD Permit Engineer

	Source	Section and Table Number
1	S-2 (U-229, B-301)	VII-A.1
2	S-3 (U-230, B-201)	VII-A.2
3	S-3 (U-230, B-201)	VII-A.2
4	S-4 (U-231, B-101)	VII-A.3
	S-4 (U-231, B-101)	VII-A.3
	S-5 (U-231, B-102)	VII-A.4
		VII-A.4
		VII-A.5
		VII-A.5
		VII-A.6
		VII-A.6
		VII-A.7
		VII-A.7
	S-9 (U-240, B-2)	

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Item	Permit Page Number	Change to Permit and Rationale
Monitoring Type	321	Change monitoring type from "CEM source test" to "O2 Monitor". This heater has an O2 monitor and not a CEM.
Monitoring Frequency	323	Change monitoring frequency from "P/SA" to "C". This heater has an O2 monitor that runs continuously.
Monitoring Type	323	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor.
Monitoring Frequency	324	Change monitoring frequency from "P/SA" to "C". This heater has an O2 monitor that runs continuously.
Monitoring Type	324	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor.
Monitoring Frequency	326	Change monitoring frequency from "P/SA" to "C". This heater has an O2 monitor that runs continuously.
Monitoring Type	326	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor.
Monitoring Frequency	328	Change monitoring frequency from "P/SA" to "C". This heater has an O2 monitor that runs continuously.
Monitoring Type	328	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor.
Limit	329	Delete line for O2 that contains the Limit "CEM for NOx and O2 (or CO2)". This is not a limit and was deleted in other similar source tables (see VII-A.8 and VII-A.10 for examples).
Monitoring Type	329	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor.
Monitoring Frequency	332	Change monitoring frequency from "P/SA" to "C". This heater has an O2 monitor that runs continuously.
Monitoring	332	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor.

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Comment Number	Source	Section and Table Number	Listed Requirement	Permit Page Number	Change to Permit and Rationale
✓ 14	S-10 (U-240, B-101)	VII-A.8	Monitoring Type	333	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor.
✓ 15	S-11 (U-240, B-201)	VII-A.9	Monitoring Frequency	335	Change monitoring frequency from "P/SA" to "C". This heater has an O2 monitor that runs continuously.
✓ 16	S-11 (U-240, B-201)	VII-A.9	Monitoring Type	335	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor.
✓ 17	S-12 (U-240, B-202)	VII-A.10	Monitoring Frequency	337	Change monitoring frequency from "P/SA" to "C". This heater has an O2 monitor that runs continuously.
✓ 18	S-12 (U-240, B-202)	VII-A.10	Monitoring Type	337	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor.
✓ 19	S-13 (U-240, B-301)	VII-A.11	Monitoring Type	338	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor.
✓ 20	S-14 (U-240, B-301)	VII-A.12	Monitoring Type	340	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor.
✓ 21	S-15 (U-244, B-501)	VII-A.13	Monitoring Type	342	
✓ 22	S-16 U-244, B-502)	VII-A.14	Monitoring Type	343	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor.
✓ 23	S-17 U-244, B-503)	VII-A.15	Monitoring Type	345	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor.
✓ 24	S-18 U-244, B-504)	VII-A.16	Monitoring Type	347	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor.
✓ 25	S-19 (U-244, B-505)	VII-A.17	Monitoring Type	348	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor.
✓ 26	S-20 (U-244, B-505)	VII-A.18	Monitoring Frequency	350	Change monitoring frequency from "P/A" to "C". This heater has an O2 monitor that runs continuously.
✓ 27	S-20 (U-244, B-505)	VII-A.18	Monitoring Type	350	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor.
✓ 28	S-22 (U-248, B-606)	VII-A.20	Monitoring Frequency	353	

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Comment Number	Source	Section and Table Number	Listed Requirement	Permit Page Number	Change to Permit and Rationale
29	S-22 (U-248, B-606)	VII-A.20	Monitoring Type	353	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor.
30	S-29 (U-200, B-5)	VII-A.21	Monitoring Frequency	354	Change monitoring frequency from "P/SA" to "C". This heater has an O2 monitor that runs continuously.
31	S-29 (U-200, B-5)	VII-A.21	Monitoring Type	354	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor.
32	S-30 (U-200, B-101)	VII-A.22	Monitoring Frequency	356	Change monitoring frequency from "P/SA" to "C". This heater has an O2 monitor that runs continuously.
33	S-30 (U-200, B-101)	VII-A.22	Monitoring Type	356	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor.
34	S-31 (U-200, B-501)	VII-A.23	Monitoring Frequency	357	Change monitoring frequency from "P/A" to "C". This heater has an O2 monitor that runs continuously.
35	S-31 (U-200, B-501)	VII-A.23	Monitoring Type	357	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor.
36	S-36 (U-200, New Heater)	II-A IV-A.24 VII-A.24	Description	8, 83-86, 358-360	Change name from "U200, B-N001" to "U200, B102". This will match the equipment number used on the P&IDs for the project.
37	S-36 (U-200, New Heater)		Future Effective Date	85	Change from "startup date" to "after initial performance test" for BAAQMD Condition 21097 Parts 3a and 3b. This will allow us time to adjust the equipment and abatement device for optimum performance.
38	S-36 (U-200, New Heater)	VI	PC 21097	306	Change note after part 3b to read: "Part 3a and 3b shall not apply until after the conclusion of the initial performance testing of S-36."
39	S-36 (U-200, New Heater)	VII-A.24	Limit	359	Delete lines for O2 and NOx that contain the Limit "CEM for NOx and O2 (or CO2)". This is not a limit and was deleted in other similar source tables (see VII-A.8 and VII-A.10 for examples).

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Comment Number	Source	Section and Table Number	Listed Requirement	Permit Page Number	Change to Permit and Rationale
40	S-36 (U-200, New Heater)	VII-A.24	Monitoring Type	359	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor.
41	S-43 (U-200, B-202)	VII-A.25	Monitoring Type	361	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor.
42	S-43 (U-200, B-202)	VII-A.25	Limit	361	Delete lines for O2 and NOx that contain the Limit "CEM for NOx and O2 (or CO2)". This is not a limit and was deleted in other similar source tables (see VII-A.8 and VII-A.10 for examples).
43	S-44 (U-200, B-201)	VII-A.26	Limit	364	Delete lines for O2 and NOx that contain the Limit "CEM for NOx and O2 (or CO2)". This is not a limit and was deleted in other similar source tables (see VII-A.8 and VII-A.10 for examples).
44	S-44 (U-200, B-201)	VII-A.26	Monitoring Type	364	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor.
45	S-107 (Tk 150)	IV-B18	Source List	234-241	Move tank from Table IV-B18 to IV-B13. Tank is an EFRT that was changed from regular gap to zero gap seal. Letter was submitted to Kelly Wee on 8/14/03 (see ESDR 283-03)
46	S-107 (Tk 150)	VII-B18	Source List	442-444	Move tank from Table VII-B18 to VII-B13. Tank is an EFRT that was changed from regular gap to zero gap seal. Letter was submitted to Kelly Wee on 8/14/03 (see ESDR 283-03)
47	S-124 (Tk 169)	IV-B18	Source List	234-241	Move tank from Table IV-B18 to IV-B13. Tank is an EFRT that was changed from regular gap to zero gap seal. Letter was submitted to Kelly Wee on 3/04/04 (see ESDR 094-04)
48	S-124 (Tk 169)	VII-B18	Source List	442-444	Move tank from Table VII-B18 to VII-B13. Tank is an EFRT that was changed from regular gap to zero gap seal. Letter was submitted to Kelly Wee on 3/04/04 (see ESDR 094-04)

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Comment Number	Source	Section and Table Number	Listed Requirement	Permit Page Number	Change to Permit and Rationale
49	S-126 (Tk 172)	II-A	Make or Type	9	Change from "external floating roof with dome" to "internal floating roof with dome" as originally requested in Attachment 3 of ConocoPhillips' appeal filed 12/30/03 with BAAQMD Hearing Board.
50	S-257 (Tk 1004)	II-A	Make or Type	10	Change from "external floating roof with dome" to "internal floating roof with dome" as originally requested in Attachment 3 of ConocoPhillips' appeal filed 12/30/03 with BAAQMD Hearing Board.
51	S-258 (Tk 1005)	II-A	Make or Type	10	Change from "external floating roof with dome" to "internal floating roof with dome" as originally requested in Attachment 3 of ConocoPhillips' appeal filed 12/30/03 with BAAQMD Hearing Board.
52	S-296, S-398 (Flares)	IV-L	Regulation Title or Description of Requirement	131	Fix typo in the description. Change "durinf" to "during"
53	S-296, S-398 (Flares)	VII-L	Monitoring Requirement Citation	391	Change citation "BAAQMD Condition 21092, Part 2" to "BAAQMD Condition 18255, Part 2". PC 21092 is for S-300 (coker), not for the flares.
54	S-301 (Sulfur Pit U-234)	II-A	Capacity	10	Change capacity to 271 long ton/day after execution of A/C 5814 per section 2.5.1 Engineering Evaluation for Application 5814.
55	S-302 (Sulfur Pit U-236)	II-A	Capacity	10	Change capacity to 271 long ton/day after execution of A/C 5814 per section 2.5.1 Engineering Evaluation for Application 5814.
56	S-303 (Sulfur Pit U-238)	II-A	Capacity	10	Change capacity to 271 long ton/day after execution of A/C 5814 per section 2.5.1 Engineering Evaluation for Application 5814.

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Comment Number	Source	Section and Table Number	Listed Requirement	Permit Page Number	Change to Permit and Rationale
57	S-301 (Sulfur Pit U-234)	VI	PC 20989	315	Change wording to similar wording as S-1001: "(98,915 long ton after S-1002, S-1003 modified in accordance with A/C 5814)". Change to sulfur plant will affect the amount of sulfur produced into the pits.
58	S-302 (Sulfur Pit U-236)	VI	PC 20989	315	Change wording to similar wording as S-1002: "(98,915 long ton after S-1002, S-1003 modified in accordance with A/C 5814)". Change to sulfur plant will affect the amount of sulfur produced into the pits.
59	S-303 (Sulfur Pit U-238)	VI	PC 20989	315	Change wording to similar wording as S-1003: "(98,915 long ton after S-1002, S-1003 modified in accordance with A/C 5814)". Change to sulfur plant will affect the amount of sulfur produced into the pits.
60	S-301 (Sulfur Pit U-234)	VII-U	Limit	404	Add limit for A/C 5814. After "89,425 long ton/yr for S-1001, 1002, 1003, 301, 302, 303" add "(98,915 long ton after modified in accordance with A/C 5814")
61	S-302 (Sulfur Pit U-236)	VII-U	Limit	404	Add limit for A/C 5814. After "89,425 long ton/yr for S-1001, 1002, 1003, 301, 302, 303" add "(98,915 long ton after modified in accordance with A/C 5814")
62	S-303 (Sulfur Pit U-238)	VII-U	Limit	404	Add limit for A/C 5814. After "89,425 long ton/yr for S-1001, 1002, 1003, 301, 302, 303" add "(98,915 long ton after modified in accordance with A/C 5814")
63	S-336 (U-231, B-104)	VII-A.29	Monitoring Frequency	368	Change monitoring frequency from "P/SA" to "C". This heater has an O2 monitor that runs continuously.
64	S-336 (U-231, B-104)		Monitoring Type	368	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor.
65	S-337 (U-231, B-105)	VII-A.30	Monitoring Frequency	370	Change monitoring frequency from "P/SA" to "C". This heater has an O2 monitor that runs continuously.
66	S-337 (U-231, B-105)	VII-A.30	Monitoring Type	370	Change monitoring type from "source test" to "O2 monitor". This heater has an O2 monitor.

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Comment Number	Source	Section and Table Number	Listed Requirement	Permit Page Number	Change to Permit and Rationale
67	S-350	IV-O	Regulation Title or Description of Requirement	139	Change "Condition 21092" in heading to "Condition 21093". Condition 21092 is for S-300, not S-350.
68	S-350	VI	PC 383 and PC 21093	274, 302	Revised permit conditions 383 and 21093 are duplicative of each other. Please eliminate PC 21093 altogether and keep the revised PC 383.
69	S-351 (U-267, B-601/B-602)	VII-A.31	Limit	371	Delete lines for O2 and NOx that contain the Limit "CEM for NOx and O2 (or CO2)". This is not a limit and was deleted in other similar source tables (see VII-A.8 and VII-A.10 for examples).
70	S-351 (U-267, B-601/B-602)	VII-A.31	Monitoring Type	372	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor.
71	S-371 (U-228, B-520)	VII-A.32	Monitoring Type	374	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor.
72	S-372 (U-228, B-521)	VII-A.33	Monitoring Type	377	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor.
73	S-438 (U-110, H-1)	VII-A.34	Monitoring Type	379	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor.
74	S-460 (U-250 Diesel Hydrotreater)	II-A	Description	13	Change name from "ULSD Hydrotreater" to "Diesel Hydrotreater". This is the name ConocoPhillips intends to call this unit.
75	S-460 (U-250 Diesel Hydrotreater)	VI	PC 20989	316	Change annual average from 11.68E6 bbls to 12.8E6 bbls. (35,000 bpd * 365 days/yr). Current limit of 11.68E6 is equivalent to 32,000 bpd annual average.
76	S-461 (U-250, New heater)	II-A IV-A.35 VII-A.35	Description	13 113-116 380-382	Change name from "U-250, B-1" to "U-250, B-701". This matches the name on the P&IDs for this heater.

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Comment Number	Source	Section and Table Number	Listed Requirement	Permit Page Number	Change to Permit and Rationale
✓ 77	S-461 (U-250, New heater)	IV-A.35	Future Effective Date	115	Change from "startup date" to "after initial performance test" for BAAQMD Condition 21096 Parts 3a and 3b. This will allow us time to adjust the equipment and abatement device for optimum performance.
✓ 78	S-461 (U-250, New heater)	VI	PC 21096	304	Change note after part 3b to read: "Part 3a and 3b shall not apply until after the conclusion of the initial performance testing of S-461."
✓ 79	S-461 (U-250, New heater)	VII-A.35	Limit	381	Delete lines for O2 and NOx that contain the Limit "CEM for NOx and O2 (or CO2)". This is not a limit and was deleted in other similar source tables (see VII-A.8 and VII-A.10 for examples).
✓ 80	S-461 (U-250, New heater)	VII-A.35	Monitoring Type	381	Change monitoring type from "CEM" to "O2 monitor". This heater has an O2 monitor.
✓ 81	S-463 (Butane Caustic Treatment System)	VI	PC 20989	316	<p>Change annual average to a bbls/yr basis rather than lbs/yr for consistency with Table II-A. 1000 bbls/day * 365 days/yr = 36500 bbls/yr.</p> <p>Note: The pounds per year listed in this permit are too low. 1000 bbls/day is equivalent to 203,162 lbs/day. 73.365 E6 lbs/365 days equal 201,000 lbs/day, which is equivalent to throughput limit of 989 bbls/day.</p>

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Comment Number	Source	Section and Table Number	Listed Requirement	Permit Page Number	Change to Permit and Rationale
82	S-463 (Butane Caustic Treatment System)	VII-V	Limit	406	Change limit from "73.365 E6" bbl/yr to "36,500 bbls/yr". See related comment for S-463 above. Note: The pounds per year listed in this permit are too low. 1000 bbls/day is equivalent to 203,162 lbs/day. 73.365 E6 lbs/365 days equal 201,000 lbs/day, which is equivalent to throughput limit of 989 bbls/day.
83	S-1001 (Sulfur Plant U-234)	VII-U	Limit	404	Add limit for A/C 5814. After "89,425 long ton/yr for S-1001, 1002, 1003, 301, 302, 303" add "(98,915 long ton after modified in accordance with A/C 5814)"
84	S-1002 (Sulfur Plant U-236)	VII-U	Limit	404	Add limit for A/C 5814. After "89,425 long ton/yr for S-1001, 1002, 1003, 301, 302, 303" add "(98,915 long ton after modified in accordance with A/C 5814)"
85	S-1003 (Sulfur Plant U-238)	VII-U	Limit	404	Add limit for A/C 5814. After "89,425 long ton/yr for S-1001, 1002, 1003, 301, 302, 303" add "(98,915 long ton after modified in accordance with A/C 5814)"
86		IX A-1	Permit Shield	467	Delete Table IX-B.1 in its entirety and insert the permit shield provisions shown Attachment 2 into Table IX-A.1.

ATTACHMENT 2

Table IX A - 1
Permit Shield for Non-applicable Requirements
ALL SOURCES

Citation	Title or Description (Reason not applicable)
BAAQMD Regulation 8, Rule 51	<p>"Organic Compounds – Adhesive and Sealant Products" (7/17/02)</p> <p>The applicant has certified that none of the regulated activities specified in this rule are currently taking place at this facility.</p>
BAAQMD Regulation 11, Rule 1	<p>"Hazardous Pollutants – Lead" (3/17/82)</p> <p>The applicant has certified that there are no sources at this facility with the potential to emit in excess of 15 pounds per day (11-1-301) each, or with the potential to result in ground level lead concentrations in excess of 1.0 microgram/m³ averaged over 24 hours (11-1-302).</p>
<u>40 CFR 60.692-3(b)</u>	<p><u>This subsection of NSPS Subpart QQQ requires vents on oil-water separators to be routed through a closed vent system to a control device. The applicant's separator has a fixed roof that is in full contact with the liquid and does not contain any vents. As indicated in Table IV-C, applicant is subject to BAAQMD Regulation 8-8-302.1, which requires a "solid vapor-tight, full contact cover which totally encloses the separator tank, chamber or basin (compartment) liquid contents, with all cover openings closed and sealed." Since no vents exist, there is nothing to route to a control device, so this subsection of Subpart QQQ does not apply.</u></p>

ATTACHMENT 3

Table IX B - 1
Permit Shield for Subsumed Requirements
S-324 API OIL/WASTEWATER SEPARATOR

Subsumed Requirement Citation	Title or Description	Streamlined Requirements	Title or Description
NSPS Subpart QQQ, 40 CFR 60.693-2(a)(1)	Floating roofs installed as alternative standard for oil-water separators shall be equipped with a closure device.	BAAQMD 8-8-302.1 and Permit Condition 1440, Part 1	The API separator shall be equipped and operated such that the fixed roof is in full contact with the liquid at all times. As described in the NSPS Subpart QQQ Request for Alternative Standards pursuant to 40 CFR 60.693-2(b) and 60.694 submitted to USEPA by Unocal on December 28, 1987, in lieu of a floating roof equipped with a closure device, the separator would be equipped with the full contact fixed roof as an equivalent closure device.
NSPS Subpart QQQ, 40 CFR 60.693-2(a)(3)	Floating roofs installed as alternative standard for oil-water separators shall be floating on the liquid (i.e., off the roof supports) at all times, except for low flow conditions.	BAAQMD 8-8-302.1 and Permit Condition 1440, Part 1	The API separator shall be equipped and operated such that the fixed roof is in full contact with the liquid at all times. As described in the NSPS Subpart QQQ Request for Alternative Standards pursuant to 40 CFR 60.693-2(b) and 60.694 submitted to USEPA by Unocal on December 28, 1987, in lieu of a floating roof equipped with a closure device, the separator would be equipped with the full contact fixed roof as an equivalent closure device.
NSPS Subpart QQQ, 40 CFR 60.697(k)	For oil-water separators subject to 60.693-2, record information from inspections conducted pursuant to the 60.693-2(a)(1)(iii)(A) and (B) requirements for floating roofs equipped with a closure device.	BAAQMD 8-8-302.1 and Permit Condition 1440, Part 1	The API separator shall be equipped and operated such that the fixed roof is in full contact with the liquid at all times. As described in the NSPS Subpart QQQ Request for Alternative Standards pursuant to 40 CFR 60.693-2(b) and 60.694 submitted to USEPA by Unocal on December 28, 1987, in lieu of a floating roof equipped with a closure device, the separator would be equipped with the full contact fixed roof as an equivalent closure device.

Major Facility Review Schedule of Compliance

FACILITY #:A0016

Attachment 5

Compliance Plan

Sources: S-425 Marine Loading Berth M1
S-426 Marine Loading Berth M2

Requirement: 40 CFR 60 Subpart J

Planned Activity	Target Date
1. Apply for an alternative monitoring plan	5/14/04
2. Implement monitoring plan	Upon approval by EPA